1:20-cv-00786-SDA\_Document 24 Filed 10/15/20 Page 1 of 2 **USDC SDNY** DOCUMENT **ELECTRONICALLY FILED** DOC #:

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U.S. Department of Justice

United States Attorney Southern District of New York

86 Chambers Street New York, New York 10007

October 14, 2020

## **BY ECF**

Hon. Stewart D. Aaron United States Magistrate Judge **United States Courthouse** 500 Pearl Street New York, New York 10007-1312 Request GRANTED. SO ORDERED. Stunt S. aun

Dated: 10/15/2020

Troche v. Commissioner of Social Security, No. 20-cv-786 (SDA) Re:

Dear Judge Aaron:

This Office represents Andrew M. Saul, the Commissioner of Social Security (the "Commissioner"), the defendant in the above-referenced action brought pursuant to 42 U.S.C. § 405(g), in which the plaintiff challenges the Commissioner's decision to deny his application for Social Security disability benefits.

I respectfully write to request, with the plaintiff's consent, a thirty-day extension of the time to file the Joint Stipulation in Lieu of Motions for Judgment on the Pleadings, from October 15, 2020, to November 16, 2020, with interim deadlines of October 28, 2020 for the Commissioner's response portions and November 11, 2020 for the plaintiff's reply portions. The extension is needed due to the press of business and the need for additional discussion with the agency about issues identified during the briefing process that may affect the Commissioner's litigation position in this case. An extension until November 16, 2020, would allow time to complete these discussions and potentially avoid further unnecessary motion practice.

The plaintiff consents to this request for an extension. This is the Commissioner's first request for an extension of time to file the Joint Stipulation in Lieu of Motions for Judgment on the Pleadings. The Court previously granted the Commissioner's requests for extension to file the certified administrative record and to advise the Court of the outcome of the parties' settlement discussions. (Dkt. Nos. 15, 19), and granted the plaintiff's request for a two-week extension of the time to file the Joint Stipulation in Lieu of Motions for Judgment on the Pleadings and interim deadlines (Dkt. No. 22.)

I thank the Court's for its consideration of this request.

Respectfully,

AUDREY STRAUSS

Acting United States Attorney

/s/ Amanda F. Parsels

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cc: Marissa Sobel (by ECF)

Attorney for Plaintiff